



South Carolina Department of Insurance

Capitol Center
1201 Main Street, Suite 1000
Columbia, South Carolina 29201

NIKKI R. HALEY
Governor

RAYMOND G. FARMER
Director

Mailing Address:
P.O. Box 100105, Columbia, S.C. 29202-3105
Telephone: (803) 737-6160

December 2, 2016

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
GOVERNMENT EMPLOYEES INSURANCE COMPANY
One GEICO Center
Macon, GA 31295-0001

Dear Sir:

On December 2, 2016, I accepted service of the attached Summons and Complaint on your behalf. I am, hereby, forwarding that accepted process on to you pursuant to the provisions of S.C. Code Ann. § 38-5-70. By forwarding accepted process on to you, I am meeting a ministerial duty imposed upon me by S.C. Code Ann. § 15-9-270. I am not a party to this case. The State of South Carolina Department of Insurance is not a party to this case. It is important for you to realize that service was effected upon your insurer on my date of acceptance for service.

You must promptly acknowledge in writing your receipt of this accepted process to sdubois@doi.sc.gov. When replying, please refer to File Number 164481, Durrell W. Cornish, et al. v. GOVERNMENT EMPLOYEES INSURANCE COMPANY, 2016-CP-10-6048.

By:

Sincerely Yours,

A handwritten signature in black ink, appearing to read "David E. Belton".

David E. Belton
Senior Associate General Counsel
(803)737-6132

Raymond G. Farmer
Director
State of South Carolina
Department of Insurance

Attachment

CC: Oana D. Johnson
215 East Bay Street, Suite 406
Charleston, SC 29401

STATE OF SOUTH CAROLINA,)

COUNTY OF CHARLESTON)

Durrell Warren Cornish and Nicola
Campbell,)

Plaintiff,)

vs.)

Government Employees Insurance
Company)

Defendant.)

IN THE COURT OF COMMON PLEAS

SUMMONS

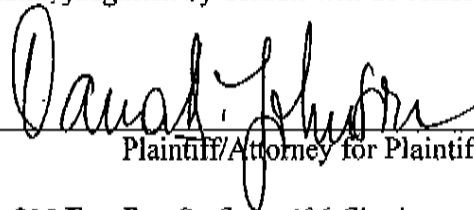
FILE NO. 2016-CP-10-6048

TO THE DEFENDANT ABOVE-NAMED:

YOU ARE HEREBY SUMMONED and required to answer the complaint herein, a copy of which is herewith served upon you, and to serve a copy of your answer to this complaint upon the subscriber, at the address shown below, within thirty (30) days after service hereof, exclusive of the day of such service, and if you fail to answer the complaint, judgment by default will be rendered against you for the relief demanded in the complaint.

Charleston, South Carolina

Dated: November 8, 2016


Plaintiff/Attorney for Plaintiff

Address: 215 East Bay St. Suite 406 Charleston SC
29401

FILED
2016 NOV 10 AM 11:20
JULIE J. ARMSTRONG
CLERK OF COURT
BY

IN THE STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

Durrell Warren Cornish and Nicola Campbell,
Plaintiffs,

v.

Government Employees Insurance Company

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

CA: 2016-CP-10-6048

COMPLAINT
(Jury Trial Demanded)

FILED
2016 NOV 10 AM 11:20
JULIE J. ARMSTRONG
CLERK OF COURT
BY

Plaintiffs complaining of the Defendant alleges and says as follows:

1. Plaintiff Durrell Cornish is an individual and a resident of York County South Carolina.
2. Plaintiff Nicola Campbell is a resident of York County, South Carolina.
3. Defendant is an insurance company, organized and existing under the laws of a state other than South Carolina, licensed to do business in South Carolina with offices in Charleston County, South Carolina and in the business of auto insurer.
4. The parties hereto, the subject-matter hereof, and all things and matters hereinafter alleged are within the jurisdiction of this Honorable Court.
5. At all times relevant hereto Plaintiffs were insured under automobile insurance policy No. 4209-56-98-72 issued by Defendant, which provided coverage for property loss in the event of a fire.
6. On or about November 7, 2014, Plaintiffs suffered a loss due to a fire to one of the vehicles insured under the policy issued by Defendant.
7. Plaintiffs are informed and believe they are entitled to benefits from the defendant on account of their fire loss.
8. Despite repeated demand, Defendant has failed and refused to indemnify Plaintiffs for their loss.

FOR A FIRST CAUSE OF ACTION

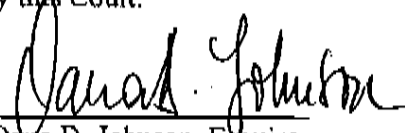
9. All of the allegations contained in paragraph 1 - 8 are hereby incorporated herein as if they had been set forth fully hereunder.
10. That the Defendant's conduct constitutes a breach of the insurance policy.
11. Plaintiff is entitled to recover actual damages and pre-judgment interest as a result of Defendant's conduct.

FOR A SECOND CAUSE OF ACTION

12. All of the allegations contained in paragraph 1 - 11 are hereby incorporated herein as if they had been set forth fully hereunder.
13. That the Defendant's refusal to pay the contracted for benefits is without reasonable basis and in bad faith.
14. Plaintiffs are entitled to damages against the Defendant in the amount of actual, consequential and punitive damages.

WHEREFORE, Plaintiffs pray judgment against the Defendant in the amount of actual, consequential, and punitive damages together with attorney fees and the costs and disbursements of the action in an amount to be determined by this Court.

BY:


Oana D. Johnson, Esquire
oana@odjlaw.com
215 East Bay St. Suite 406
Charleston, SC 29401
T: (843) 203-4195
oana@odjlaw.com

ATTORNEY FOR THE PLAINTIFFS

Charleston, South Carolina
November 8, 2016

STATE OF SOUTH CAROLINA
DEPARTMENT OF INSURANCE

P.O. BOX 100105
COLUMBIA, S.C. 29202-3105



91 7199 9991 7037 4833 9097

CERTIFIED MAIL

RETURN RECEIPT REQUESTED
SERVICE OF PROCESS

GOVERNMENT EMPLOYEES INSURANCE COMPANY
One GEICO Center
Macon, GA 31295-0001

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